

# Morgan Lewis

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January 13, 2021

**MEMO ENDORSED, p. 2**

**Via ECF**

The Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Romero v. Colgate-Palmolive Company, No. 1:20-cv-09216-SHS***  
**Request to Extend Time to Respond and for Adjournment of Initial Conference**

Dear Judge Stein:

We represent defendant Colgate Palmolive Company ("Defendant") in the above-referenced action. Pursuant to Rules 1.A and 1.E of Your Honor's Individual Practices, we write with the consent of counsel for Plaintiff Josue Romero ("Plaintiff") respectfully to request that the Court (A) extend Defendant's time to respond to Plaintiff's Complaint, from January 15, 2021 to February 16, 2021; and (B) adjourn the initial conference scheduled for January 18, 2021 at 10:00 a.m. to a date and time that is convenient for the Court at least two weeks after the new response deadline.

This is Defendant's first request for an extension of time to file a responsive pleading and first request to adjourn the initial conference. In support of these requests, counsel for Defendant states that the parties are engaged in discussions about a possible early resolution of this action. If granted, this extension and adjournment will permit the parties to focus on those efforts, rather than on pleadings and litigation. As noted above, Plaintiff's counsel consents to these requests. If granted, this extension and adjournment will not affect any other date scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

*/s/ Michael F. Fleming*

Michael F. Fleming

*Attorney for Defendant*

cc: All Counsel of Record (via ECF)

**Morgan, Lewis & Bockius LLP**

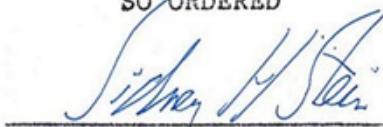
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**Defendant's time to answer or move in response to the complaint is extended to February 16, 2021. The initial conference is adjourned to March 2, 2021, at 11:00 a.m.**

**Dated: New York, New York**  
**January 14, 2021**

SO ORDERED



SIDNEY H. STEIN  
U.S.D.J.